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April 3, 2020

By ECF

The Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: United States v. Portillo*  
*Criminal Docket Number 09-1142 (LAP)*

Dear Judge Preska:

I had hoped to be able to reply today to the government's response, filed January 31, 2020, to Ms. Portillo's letter of October 4, 2019, providing further briefing on issues identified by the Court, but events have overtaken my schedule and I write for a further adjournment. AUSA Daniel Tracer consents to this request.

I have been working this week with multiple incarcerated clients for whom I have either moved or expect shortly to move for compassionate release because of the current crisis. Meanwhile, I have a deadline on Monday in another case before your Honor which I am working to meet. I respectfully request until and including April 20, 2020, within which to file my reply.

I appreciate the Court's consideration and trust that you and everyone in Chambers is staying safe.

Respectfully submitted,

/s/  
Andrew J. Frisch

cc: AUSA Daniel Tracer

**The request for an extension until  
April 20 is granted. SO ORDERED.**

*Loretta A. Preska* 4/3/2020